

Rec'd  
11/6/03UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTSUNITED STATES OF AMERICA  
Plaintiff,

vs.

ANGUS MACPHERSON  
Defendant.

Docket No.: 03M-1141-JBD

**DEFENDANT'S MOTION TO AMEND  
CONDITIONS OF PRE-TRIAL RELEASE**

Defendant, Angus MacPherson, hereby moves this Court to amend the conditions of his pre-trial release to allow him to leave the Commonwealth of Massachusetts for the purpose of transferring from McLean Hospital in Belmont, Massachusetts to the Plymouth House in Plymouth, New Hampshire. As grounds therefore, defendant states that he was admitted to an inpatient detoxification program at McLean Hospital immediately following his initial appearance before this Court. The defendant, along with his health professionals, wish to transfer his treatment program to the Plymouth House in Plymouth, New Hampshire to complete his treatment regimen. Counsel for the defendant has discussed this matter with Assistant United States Attorney James Lang who has represented that his office has no opposition to this Motion.

**WHEREFORE**, the defendant respectfully requests that this Court amend the conditions of his pre-trial release to allow his transfer from McLean Hospital in Belmont, Massachusetts to the Plymouth House in Plymouth, New Hampshire.



Respectfully Submitted,

The Defendant,  
Angus MacPherson  
By his attorneys,

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